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# MEMO ENDORSED

## VIA ELECTRONIC FILING

Honorable William H. Pauley III  
United States Courthouse  
500 Pearl Street, Courtroom 20B  
New York, New York 10007

May 14, 2021

**Application Granted.** The deadline to submit the joint pre-trial order and the final pre-trial conference scheduled for June 8, 2021 are adjourned without date. The parties are directed to submit a status report by June 25, 2021.

Re: Brenda Montanez v. Target Corporation, Docket No.: 1:19-CV-2173-WHP

Dear Judge Pauley:

My firm represents the plaintiff in the above-referenced matter. My office is respectfully requesting an extension of time to submit a joint pre-trial order, with an attendant adjournment of the final pre-trial conference. This request is being made after consultation with, and consent of, defense counsel.

This court originally scheduled a deadline of May 11, 2021 to submit the joint pre-trial order with the final pre-trial conference to be held on May 25, 2021. By letter dated May 4, 2021 defense counsel requested, with my consent, an extension of time to submit the order, due to an unfortunate family tragedy suffered by his staff member and the possibility of an outside mediation being held in this matter. This honorable court was gracious enough to grant the request, extend the deadline of submission of the order to May 25, 2021 and adjourn the pre-trial conference to June 8, 2021.

The parties have since been able to agree upon outside mediation and scheduled it for June 4, 2021, which is sooner than anticipated. As there is a fair possibility that this matter can be settled at the mediation, thus obviating a need to make hard decisions regarding how the case is to be tried and trial strategy, my office is respectfully requesting that the deadline for the submission of the pre-trial order be extended just a few weeks to a date after the mediation, such as to June 18, 2021, with an accompanying adjournment of the final pre-trial conference subject to this honorable court's convenience and calendar.

We thank Your Honor for your consideration of this request.

Very truly yours,  
**KRIEGER, WILANSKY & HUPART, ESQS.**

By:

Brett R. Hupart

cc: CONNELL FOLEY LLP (via ECF)

SO ORDERED:

Dated: May 14, 2021  
New York, New York

WILLIAM H. PAULEY III  
U.S.D.J.